

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

BRUNO HOFFMAN, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

PHILIP LAUGHLIN, MICHAEL SABOLINSKI,
ALBERT ERANI, DONNA ABELLI LOPOLITO,
JOHN J. ARCARI, HERBERT M. STEIN,
ALAN ADES, BERNARD A. MARDEN,
ALAN W. TUCK, NOVARTIS PHARMA AG and
PRICE WATERHOUSECOOPERS LLP,

Defendants.

No.: 04-10027-JLT

**LEAD PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO FILE REPLY TO
PRICEWATERHOUSECOOPERS LLP'S OPPOSITION AND RESPONSE TO
PLAINTIFFS' MOTION FOR ENTRY OF SCHEDULING ORDER**

Lead Plaintiff hereby moves this Court for leave to file the attached reply to defendant PricewaterhouseCoopers LLP's Opposition and Response to Plaintiffs' Motion for Entry of Scheduling Order ("PwC Opposition"). As grounds therefore, Lead Plaintiff states that Lead Plaintiff's response to issues first raised in PwC's Opposition will aid the

Court in its decision on Lead Plaintiff's Motion for Entry of Scheduling Order and will thereby promote judicial economy. Defendant PwC does not oppose this motion.

DATED: August 30, 2004

Respectfully Submitted,

MOULTON & GANS, P.C.

By: /s/ Nancy Freeman Gans
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**Liaison Counsel for Lead Plaintiffs Bruno
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**Lead Counsel for Lead Plaintiffs Bruno
Hoffman, John H. Bowie, Richard
Madigan, and Richard Conen**

LOCAL RULE 7.1 CERTIFICATE

I, Nancy Freeman Gans, Esq., Moulton & Gans, P.C., Liaison Counsel for Lead Plaintiffs hereby certify that on August 30, 2004, I consulted with Matthew J. Matule, Esquire, Skadden, Arps, Slate, Meagher & Flom, LLP, counsel for defendant PricewaterhouseCoopers LLP, concerning the above motion. Defendant PwC does not oppose this motion.

/s/ Nancy Freeman Gans
Nancy Freeman Gans

CERTIFICATE OF SERVICE

I, Nancy Freeman Gans, hereby certify that a true copy of the above document was served upon the attorney of record for each party by hand and/or by mail on August 30, 2004.

/s/ Nancy Freeman Gans

Nancy Freeman Gans